

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

TEXAS GUN RIGHTS, INC., *et al.*,

Plaintiffs,

v.

BUREAU OF ALCOHOL, TOBACCO,
FIREARMS, AND EXPLOSIVES.

Defendant.

Case No. 4:23-CV-578-O

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO
COMPLAINT**

Defendant, the Bureau of Alcohol, Tobacco, Firearms, and Explosives, moves to extend the deadline to respond to Plaintiffs' Complaint, ECF No. 1, for which the current deadline is August 8, 2023. Defendant has conferred with Plaintiffs, and Plaintiffs consent to this request.

Plaintiffs filed suit in this matter on June 8, 2023, ECF No. 1, served Defendant on June 9, 2023, ECF No. 14, and filed a motion for preliminary injunction on June 15, 2023, ECF Nos. 10, 11. Plaintiffs' motion for preliminary injunction remains pending.

Accordingly, Defendant respectfully requests that the Court extend its deadline to respond to Plaintiffs' Complaint until 30 days after the Court resolves Plaintiffs' preliminary injunction motion. Defendant appreciates the Court's consideration and respectfully requests entry of the attached proposed order.

Dated: August 8, 2023

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

BRIGHAM J. BOWEN
Assistant Branch Director

/s/ Taylor Pitz
TAYLOR PITZ (CA Bar No. 332080)
JODY D. LOWENSTEIN (MT Bar No. 55816869)
MICHAEL DREZNER (VA Bar No. 83836)
Trial Attorneys
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW
Washington, DC 20005
Phone: (202) 305-5200
Email: taylor.n.pitz@usdoj.gov

Attorneys for Defendant

CERTIFICATE OF SERVICE

On August 8, 2023, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the Court's electronic case filing system. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Taylor Pittz
TAYLOR PITZ
Trial Attorney
U.S. Department of Justice